

Law Offices  
**MORGAN, LEWIS & BOCKIUS LLP**

101 Park Avenue  
 New York, New York 10178  
 (212) 309-6000

Attorneys for Defendants American Express Retirement Plan,  
 American Express Company, American Express Company  
 Employee Benefits Administration Committee

**UNITED STATES DISTRICT COURT  
 SOUTHERN DISTRICT OF NEW YORK**

-----x	
Paula Kritzman, Individually and on behalf	:
of all others similarly situated,	:
	:
Plaintiff,	:
	:
v.	:
	Civil Action No. 06-CV-0233
	:
AMERICAN EXPRESS RETIREMENT	:
PLAN, AMERICAN EXPRESS COMPANY,	:
AMERICAN EXPRESS COMPANY EMPLOYEE	:
BENEFITS ADMINISTRATION COMMITTEE,	:
JOHN DOES 1-100,	:
	:
Defendants.	:
-----x	

**NOTICE OF MOTION TO ADMIT COUNSEL PRO HAC VICE**

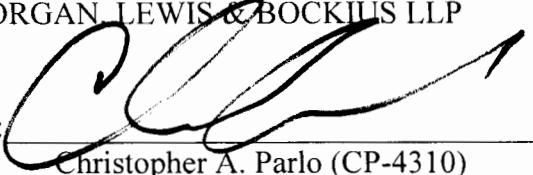
PLEASE TAKE NOTICE that upon the annexed Affidavit of Jeremy P. Blumenfeld in support of this Motion and the Certificates of Good Standing annexed thereto, we will move this Court at the United States Courthouse for the Southern District of New York, pursuant to Rule 1.3(c) of the Local Rules of the United States District Court for the Southern District of New York for an Order allowing the admission of Jeremy P. Blumenfeld, an associate of the firm of MORGAN, LEWIS & BOCKIUS LLP and a member in good standing of the Bar in the states of New Jersey, Pennsylvania and Ohio, as attorney *pro hac vice* to argue or try these proceedings in whole or in part.

Dated: New York, New York  
March 13, 2006

Respectfully submitted,

MORGAN, LEWIS & BOCKIUS LLP

By:

  
Christopher A. Parlo (CP-4310)

101 Park Avenue  
New York, New York 10178  
(212) 309-6000

*Attorneys for Defendants  
American Express Retirement Plan, American  
Express Company, American Express Company  
Employee Benefits Administration Committee*

To: Curtis V. Trinko, Esq.  
LAW OFFICES OF CURTIS V. TRINKO, LLP  
16 West 46th Street  
7th Floor  
New York, NY 10036  
*Attorneys for Plaintiff*

Richard S. Schiffrin, Esq.  
Joseph H. Meltzer, Esq.  
Edward W. Ciolkosz, Esq.  
Joseph A. Weeden, Esq.  
SCHIFFRIN & BARROWAY, LLP  
280 King of Prussia Road  
Radnor, PA 19087  
*Attorneys for Plaintiff*

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JOHN DOES 1-100,	:
	:
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-----x	

**MOTION FOR LEAVE OF COURT TO APPEAR PRO HAC VICE**

Christopher A. Parlo, Esquire, a Member of the firm of Morgan, Lewis & Bockius LLP,  
101 Park Avenue, New York, New York 10178, respectfully represents as follows:

1. The undersigned is a member in good standing of the bar of this Court. Pursuant to Rule 1.3(c) of the Local Rules of the United States District Court for the Southern District of New York, the undersigned respectfully moves the admission *pro hac vice* in this action of Jeremy P. Blumenfeld, Esquire, of Morgan, Lewis & Bockius LLP, 1701 Market Street, Philadelphia, Pennsylvania, 19103.
2. Mr. Blumenfeld is a member in good standing of the Bar in the state of Pennsylvania.

3. Mr. Blumenfeld intends to represent Defendants American Express Retirement Plan, American Express Company and American Express Company Employee Benefits Administration Committee in the above-captioned proceedings. Based on the affidavit annexed hereto, Mr. Blumenfeld certifies that he is eligible for admission to this Court and is admitted to practice and is in good standing in the jurisdiction shown in paragraph 2 above. Mr. Blumenfeld further certifies that there are no pending disciplinary proceedings pending against him in any State or Federal court.

**WHEREFORE**, it is respectfully requested that Mr. Blumenfeld be admitted to practice before this Court *pro hac vice* as counsel for all purposes in these proceedings.

Dated: New York, New York  
March 13, 2006

Respectfully submitted,

MORGAN, LEWIS & BOCKIUS LLP

By:

  
Christopher A. Parlo (CP-4310)

101 Park Avenue  
New York, New York 10178  
(212) 309-6000

*Attorneys for Defendants  
American Express Retirement Plan, American  
Express Company, American Express Company  
Employee Benefits Administration Committee*

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**MORGAN, LEWIS & BOCKIUS LLP**  
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Attorneys for Defendants American Express Retirement Plan,  
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**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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AMERICAN EXPRESS COMPANY EMPLOYEE	:
BENEFITS ADMINISTRATION COMMITTEE,	:
JOHN DOES 1-100,	:
	:
Defendants.	:
-----x	

**AFFIDAVIT OF JEREMY P. BLUMENFELD IN SUPPORT OF MOTION  
TO ADMIT COUNSEL PRO HAC VICE**

COMMONWEALTH OF PENNSYLVANIA	)
	):
COUNTY OF PHILADELPHIA	)

**JEREMY P. BLUMENFELD**, being duly sworn, hereby deposes and says as follows:

1. I am an associate with the law firm of Morgan, Lewis & Bockius LLP.
2. I submit this affidavit in support of my motion for admission to practice *pro hac vice* in the above-captioned proceedings.
3. As shown in the Certificate of Good Standing annexed hereto, I am a member in good standing of the Bar in the state of Pennsylvania.

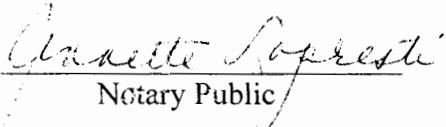
4. There are no pending disciplinary proceedings against me in any State or Federal court.

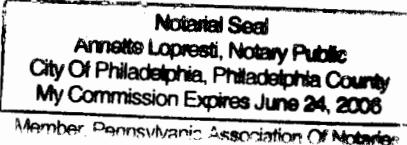
5. Wherefore, your affiant respectfully submits that he be permitted to appear as counsel and advocate *pro hac vice* in these proceedings.

Respectfully submitted,

  
\_\_\_\_\_  
Jeremy P. Blumenfeld

Sworn to before me this  
7th day of March, 2006.

  
\_\_\_\_\_  
Annette Lopresti  
Notary Public





Supreme Court of Pennsylvania

**CERTIFICATE OF GOOD STANDING**

*Jeremy P. Blumenfeld, Esq.*

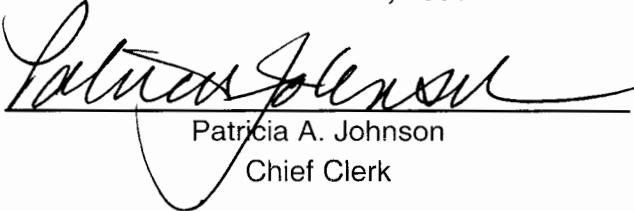
**DATE OF ADMISSION**

*October 27, 2000*

The above named attorney was duly admitted to the bar of the Commonwealth of Pennsylvania, and is now a qualified member in good standing.



Witness my hand and official seal  
Dated: March 7, 2006

  
\_\_\_\_\_  
Patricia A. Johnson  
Chief Clerk

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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AMERICAN EXPRESS COMPANY EMPLOYEE	:	
BENEFITS ADMINISTRATION COMMITTEE,	:	
JOHN DOES 1-100,	:	
	:	
Defendants.	:	

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**ADMISSION TO PRACTICE PRO HAC VICE**

The motion for admission to practice *pro hac vice* in the above-captioned proceedings is granted. The admitted attorney, JEREMY P. BLUMENFELD, is permitted to argue or try these particular proceedings in whole or in part as counsel or advocate.

An attorney admitted to practice *pro hac vice* is required to pay a \$25.00 attorney admission fee and present this Order to the intake deputy clerk in the Clerk's Office. When paying by mail, return a copy of this Order to the Clerk's Office with the required fee.

This Order confirms your appearance as counsel in these proceedings, and it will be entered on the Court's docket. A notation of your admission *pro hac vice* for the above listed proceedings will be made on the roll of attorneys.

The attorney admitted *pro hac vice* must serve a copy of this Order on all other counsel in these proceedings.

Dated: \_\_\_\_\_.

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U.S.D.J.

cc: Pro Hac Vice Attorney  
Court File

**AFFIRMATION OF SERVICE**

I hereby affirm that a copy of the foregoing Notice of Motion to Admit Counsel *Pro Hac Vice*, Motion for Leave of Court to Appear *Pro Hac Vice*, the Affidavit of Jeremy P. Blumenfeld, and a Proposed Order were served by regular mail on March 13, 2006 on:

Curtis V. Trinko, Esq.  
LAW OFFICES OF CURTIS V. TRINKO, LLP  
16 West 46th Street  
7th Floor  
New York, NY 10036  
*Attorneys for Plaintiff*

Richard S. Schiffrian, Esq.  
Joseph H. Meltzer, Esq.  
Edward W. Ciolko, Esq.  
Joseph A. Weeden, Esq.  
SCHIFFRIN & BARROWAY, LLP  
280 King of Prussia Road  
Radnor, PA 19087  
*Attorneys for Plaintiff*

I affirm the foregoing statements are true to the best of my knowledge.

  
\_\_\_\_\_  
Tamara Garnes Mata